

CALIFORNIA ENERGY COMMISSION

CHARLES R. IMBRECHT
Chairman



April 14, 1989

Carl P. Gertz, Project Manager
Yucca Mountain Project Office
U.S. Department of Energy
Box 98518
Las Vegas, Nevada 89193-8518

Dear Mr. Gertz:

The State of California, through the California Energy Commission, appreciates the opportunity to comment on the Final Site Characterization Plan for the proposed High-Level Nuclear Waste Repository located at Yucca Mountain, Nevada. State agencies included in this review include the State Water Resources Control Board, the California Department of Fish and Game, the California Department of Conservation's Division of Mines and Geology, the California Department of Water Resources, and the California Parks and Recreation. Our comments focus on the adequacy of the Site Characterization Plan for developing information relevant to potential impacts to California.

The most important geologic issue relevant to California is potential groundwater contamination resulting from an accidental radionuclide release at the site. Preliminary site characterization studies conclude that Death Valley is hydraulically connected to, and down-gradient of, the aquifer beneath the Yucca Mountain site. The potential for migration of radionuclide contaminants into eastern California aquifers (i.e., into the Death Valley regional groundwater basin), therefore, is of concern as are potential impacts on water supplies for California fish and wildlife populations in and near the Death Valley National Monument.

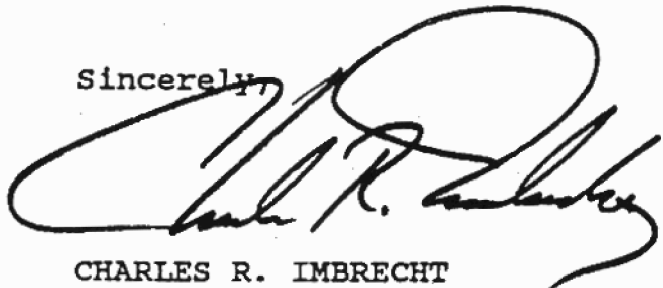
In order to determine whether potential impacts within California might occur, the Site Characterization Plan (SCP) should include complete regional, as well as local, aquifer characterization. Emphasis should be placed on adequately qualifying and quantifying potential aquifer contamination down-gradient of the site. Future studies should concentrate on developing an accurate local and regional hydrogeologic model, with consideration of factors of the hydrogeologic regime that are dynamic over the post-closure time frame. In addition, the SCP should include provisions to assess potential effects on fish and wildlife populations dependent on potentially affected groundwater supplies, if contamination is a realistic concern.

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We request that the State's Division of Mines and Geology be notified in advance of any studies, for example geologic/seismic studies, to be conducted in California as part of the Yucca Mountain Repository Site investigation. California has geologic information which may prove to be useful to the federal government's investigation of the Yucca Site. In turn, geologic studies conducted within the state as part of the site characterization program would be of value to the state.

Our more detailed comments are attached. Any questions regarding these comments may be directed to Barbara Byron (916/324-3273) or Daniel Nix (916/324-3167).

Sincerely,

A large, stylized handwritten signature in black ink, appearing to read "Charles R. Imbrecht".

CHARLES R. IMBRECHT
California Energy Commission

Enclosure